

Exhibit B



Mike Cilento <michael@ilawco.com>

VPN v Dikian/ [REDACTED] - amended complaint

1 message

Mike Cilento <michael@ilawco.com>

Wed, Apr 26, 2023 at 5:11 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>

Cc: Brett Lewis <brett@ilawco.com>, Michael Druckman <mdruckman@ilawco.com>

Dear Mike R. - as discussed on our meet and confer re: VPN's planned motion to amend, see attached redline (and clean) copies of the proposed amended complaint. Among other minor things, it names [REDACTED], adds additional allegations regarding the previous victim, and drops the RICO claim.

If your client will agree to stipulate to allow the filing of the amended complaint, please let us know. If your client will be opposing, please let us know.

The only hiccup here is that, while we originally thought the deadline to file the motion to amend was 5/5, due to an ambiguity/mistake in the scheduling order that set the last day to hear the motion as a Wednesday instead of the required Friday, it appears the motion is due this Friday, 4/28 (so as to be heard before 5/24 in the scheduling order). Thus, we would need your client's agreement to allow the amended complaint by Thursday night, or else we will file our Motion on Friday to be safe under the scheduling order. We apologize for this tight turnaround and thank you.

Relatedly, in theory, if [REDACTED] were to agree to allow the amended complaint, and if he wanted us to hold off on filing in order to discuss any possible resolution to the case before [REDACTED] is named publicly, which I remember you said would hamper settlement talks, then we could do so. But again, because of the tight timing, we would need your client's agreement to the amendment by Thursday night, and then we could hold off on filing, if desired.

Hope that all makes sense. I am free for a call if you would like to discuss.

Thanks
Mike



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2 attachments

draft clean amended complaint vpn v [REDACTED].pdf
173K

draft redline amended complaint vpn v [REDACTED].pdf
207K